



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D C 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

JUL 30 2012

Michele Brunlinger
Liphatech Inc
3600 W Elm Street
Milwaukee WI 53209

Subject Amendment to add the new 100 restriction to the label and to update container handling statements
EPA Registration No /Primary Brand Names

7173 239	Difethialone Block
7173 151	Rozol Pellets
7173 288	Difethialone Block 0707
7173 238	Generation Meal
7173 258	Difethialone Paste Place Packs
7173 240	Generation Blue Pellets Bait Packs
7173 226	Generation Block
7173 229	Generation Blue Pellets

Submission Date March 14, 2012

Dear Ms Brunlinger

The labels referred to above submitted under FIFRA as amended are **acceptable**. Please submit one final printed copy for the above mentioned labels before releasing the products for shipment. If you have any questions please contact Gene Benbow at (703) 347 0235 or via email at benbow.gene@epa.gov

Sincerely

A handwritten signature in black ink, appearing to read "John Hebert", is written over a large, loopy circular flourish.

John Hebert
Product Manager 07
Insecticide Rodenticide Branch
Registration Division (7505P)

PCO Use Label Center/Front Panel

Difethialone Paste Place Packs

FOR INDOOR AND OUTDOOR USE

KILLS NORWAY RATS, ROOF RATS, HOUSE MICE AND WARFARIN RESISTANT
HOUSE MICE

NORWAY RATS AND HOUSE MICE MAY CONSUME A LETHAL DOSE IN ONE
NIGHT S FEEDING WITH FIRST DEAD RODENTS APPEARING FOUR OR FIVE
DAYS AFTER FEEDING BEGINS

Active Ingredient difethialone	0 0025%
Inert Ingredients	99 9975%
Total	100 0000%

KEEP OUT OF REACH OF CHILDREN

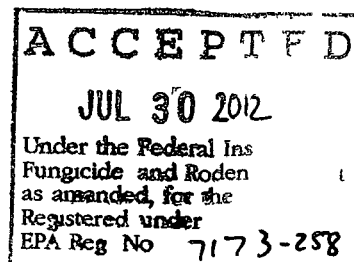
CAUTION

See [side][back][inner][outer] [panel][carton][label] for additional precautionary
statements

(Liphatech Logo)
Liphatech Inc
3600 W Elm Street
Milwaukee WI 53209
414 351 1476

Net Weight

16 lbs (4 pails X 4 lbs each) or
16 lbs (2 pails X 8 lbs each) or
18 lbs (2 pails X 9 lbs each) or
32 lbs (4 pails x 8 lbs each) or
40 lbs (4 pails X 10 lbs each)
or
16 lbs up to 2000 lbs



Statement required on label of inner packages holding less than 16 pounds of bait
It is illegal to sell this product in individual containers holding less than 16 pounds of
bait

PRECAUTIONARY STATEMENTS
Hazard to Humans and Domestic Animals

CAUTION Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Keep away from children, domestic animals and pets. All handlers (including applicators) must wear long sleeved shirt, long pants, shoes, socks, and waterproof gloves. Any person who retrieves carcasses or unused bait following application of this product must wear waterproof gloves.

User Safety Requirements Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco or using the toilet, and change into clean clothing.

FIRST AID Have this label with you when obtaining treatment advice.

If swallowed Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor.

If in eyes Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor immediately for treatment advice.

If on skin or clothing Take off contaminated clothing. Rinse skin with plenty of cool water for 15-20 minutes. Call a poison control center or doctor immediately for treatment advice.

TREATMENT FOR PET POISONING If animal eats bait, call veterinarian at once.

NOTE TO PHYSICIAN OR VETERINARIAN Contains the anticoagulant difethialone. If swallowed, this material may reduce the clotting ability of blood and cause bleeding. For humans or animals ingesting bait and/or showing obvious poisoning symptoms (bleeding or prolonged prothrombin times), give Vitamin K₁ intramuscularly or orally. Also for pets, if needed, check prothrombin time every 3 days until values return to normal (up to 30 days). In severe cases, blood transfusions may be needed.

ENVIRONMENTAL HAZARDS This product is extremely toxic to mammals and birds. Dogs, cats and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten this bait. Do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash water or rinsate.

STORAGE AND DISPOSAL Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage Store in original container in a cool, dry place inaccessible to children and pets.

Pesticide Disposal Wastes resulting from the use of this product may be disposed of in trash or at an approved waste disposal facility.

Container Handling Nonrefillable container. Do not reuse or refill this container. **[Plastic]** Completely empty container, then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill. **[Paper]** Completely empty container, then dispose of empty container in trash or at an approved waste disposal facility.

WARRANTY To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

PCO Use Label side/back/inner panel

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling

READ THIS LABEL and follow all use directions and precautions Use only for the sites pests and application methods described on this label

IMPORTANT Do not expose children pets or other nontarget animals to rodenticides To help prevent accidents

1 Store product not in use in a location out of reach of children and pets

2 Apply bait in locations out of reach of children pets domestic animals and nontarget wildlife or in tamper resistant bait stations These stations must be resistant to destruction by dogs and children under six years of age and must be used in a manner that prevents such children from reaching into bait compartments and obtaining bait If bait can be shaken from stations when they are lifted units must be secured or otherwise immobilized Even stronger bait stations are needed in areas open to hoofed livestock raccoons bears other potentially destructive animals or in areas prone to vandalism

3 Dispose of product container unused spoiled and unconsumed bait as specified on this label

Note Bait stations are mandatory for outdoor above ground use Tamper resistant bait stations must be used if children pets non target mammals or birds may access the bait

USE RESTRICTIONS This product can only be used to control Norway rats roof rats and house mice in and within 100 feet of man made structures constructed in a manner so as to vulnerable to commensal rodent invasions and/or to harboring or attracting rodent infestations Examples of such structures include homes and other permanent or temporary residences food processing facilities industrial and commercial buildings trash receptacles agricultural and public buildings transport vehicles (ships trains aircraft) docks and port or terminal buildings and related structures around and associated with these sites Fence and perimeter baiting beyond 100 feet from a structure as defined above is prohibited Do not sell this product in individual containers holding less than 16 pounds of bait Do not place near or inside ventilation duct openings Do not contaminate water food feedstuffs food or feed handling equipment or milk or meat handling equipment Do not apply directly to food or feed crops Do not broadcast bait Burrow baiting with this product is prohibited

Selection of Treatment Areas Determine areas where rats and/or house mice will most likely find and consume bait Generally these are along walls by gnawed openings in corners and concealed places between floors or walls beside burrows or in locations where rats and/or house mice or their signs have been observed Remove as much alternative food as possible

APPLICATION DIRECTIONS

House Mice Apply 1 [pack][pouch] per placement usually spaced 8 to 12 feet apart Up to 4 [packs][pouches] may be needed at points of very high house mouse activity Maintain a constant supply of fresh bait for 15 days or until signs of house mouse activity cease

Rats Apply 6 to 25 [packs][pouches] per placement usually spaced 15 to 30 feet apart Maintain a constant supply of fresh bait for 10 days or until signs of rat activity cease

Follow up Replace contaminated or spoiled bait immediately Wearing waterproof gloves collect and dispose of all visible dead animals and leftover bait as well as any bait that has become accessible to non target animals To discourage reinfestation limit sources of rodent food water and harborage as much as possible If reinfestation does occur repeat treatment For a continuous infestation set up permanent bait stations and replenish bait as needed

EPA Reg No 7173 258
EPA Est No 7173 WI 1

Product No
Label No

Optional Statements

Satisfaction guaranteed or your money back

Do not tear open the [pack][pouch] rats and mice will chew through the wrapper to get at the bait

Difethialone Paste Place Packs

FOR INDOOR AND OUTDOOR USE

**KILLS NORWAY RATS, ROOF RATS, HOUSE MICE AND WARFARIN RESISTANT
HOUSE MICE**

**NORWAY RATS AND HOUSE MICE MAY CONSUME A LETHAL DOSE IN ONE
NIGHT'S FEEDING WITH FIRST DEAD RODENTS APPEARING FOUR OR FIVE
DAYS AFTER FEEDING BEGINS**

Active Ingredient difethialone	0 0025%
Inert Ingredients	<u>99 9975%</u>
Total	100 0000%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See [side][back][inner][outer] [panel][carton][label] for additional precautionary
statements

(Liphatech Logo)
Liphatech Inc
3600 W Elm Street
Milwaukee WI 53209
414 351 1476

Net Weight

8 lbs (4 pails X 2 lbs each)
8 lbs (2 pails X 4 lbs each)
or
8 pounds up to 2000 pounds

Statement required on label of inner packages holding less than 8 pounds of bait
It is illegal to sell this product in individual containers holding less than 8 pounds of bait

PRECAUTIONARY STATEMENTS
Hazard to Humans and Domestic Animals

CAUTION Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Keep away from children, domestic animals and pets. All handlers (including applicators) must wear long sleeved shirt, long pants, shoes, socks, and waterproof gloves. Any person who retrieves carcasses or unused bait following application of this product must wear waterproof gloves.

User Safety Requirements Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco or using the toilet, and change into clean clothing.

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TREATMENT FOR PET POISONING If animal eats bait, call veterinarian at once.

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ENVIRONMENTAL HAZARDS This product is extremely toxic to mammals and birds. Dogs, cats and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten this bait. Do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash water or rinsate.

STORAGE AND DISPOSAL Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage Store in original container in a cool, dry place inaccessible to children and pets.

Pesticide Disposal Wastes resulting from the use of this product may be disposed of in trash or at an approved waste disposal facility.

Container Handling Nonrefillable container. Do not reuse or refill this container. **[Plastic]** Completely empty container, then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill. **[Paper]** Completely empty container, then dispose of empty container in trash or at an approved waste disposal facility.

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IMPORTANT Do not expose children pets or other nontarget animals to rodenticides To help prevent accidents

- 1 Store product not in use in a location out of reach of children and pets
- 2 Apply bait in locations out of reach of children pets domestic animals and nontarget wildlife or in tamper resistant bait stations These stations must be resistant to destruction by dogs and children under six years of age and must be used in a manner that prevents such children from reaching into bait compartments and obtaining bait If bait can be shaken from stations when they are lifted units must be secured or otherwise immobilized Even stronger bait stations are needed in areas open to hoofed livestock raccoons bears other potentially destructive animals or in areas prone to vandalism
- 3 Dispose of product container unused spoiled and unconsumed bait as specified on this label

Note Bait stations are mandatory for outdoor above ground use Tamper resistant bait stations must be used if children pets non target mammals or birds may access the bait

USE RESTRICTIONS This product can only be used to control Norway rats roof rats and house mice in and within 100 feet of agricultural buildings and man made agricultural structures constructed in a manner so as to be vulnerable to commensal rodent invasions and/or to harboring or attracting rodent infestations Fence and perimeter baiting beyond 100 feet from an agricultural structure as defined above is prohibited Do not sell this product in individual containers holding less than 8 pounds of bait Do not place near or inside ventilation duct openings Do not contaminate water food feedstuffs food or feed handling equipment or milk or meat handling equipment Do not apply directly to food or feed crops Do not broadcast bait

Burrow baiting with this product is prohibited

Selection of Treatment Areas Determine areas where rats and/or house mice will most likely find and consume bait Generally these are along walls by gnawed openings in corners and concealed places between floors or walls beside burrows or in locations where rats and/or house mice or their signs have been observed Remove as much alternative food as possible

APPLICATION DIRECTIONS

House Mice Apply 1 [pack][pouch] per placement usually spaced 8 to 12 feet apart Up to four [packs][pouches] may be needed at points of very high house mouse activity Maintain a constant supply of fresh bait for 15 days or until signs of house mouse activity cease

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EPA Reg No 7173 258

EPA Est No 7173 WI 1

Product No

Label No

Optional Statements

Satisfaction guaranteed or your money back

Do not tear open the [pack][pouch] rats and mice will chew through the wrapper to get at the bait

**PLACE PACK LABEL
FOR BOTH PCO AND
AGRICULTURAL USE PRODUCTS**

Front Panel

<p>Difethialone Paste Place Packs</p> <p>KEEP OUT OF REACH OF CHILDREN PETS AND NONTARGET ANIMALS</p> <p>CAUTION See carton for complete directions and precautions. It is illegal to sell these bait [packs][pouches] individually</p> <p>Net Weight 0.35 oz (10 grams)</p>
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Back Panel

Difethialone Paste Place Packs	
Active Ingredient	
difethialone	0.0025 /
Inert Ingredients	99.9975 /
Total	100.0000 /
EPA Reg. No. 7173-258	
EPA Est. No.	
Liphatech Inc. Milwaukee WI 53209	
414 351 1476	

ALTERNATE CAUTION LANGUAGE

See outer [package][pail][carton][label] for complete directions and precautions. It is illegal to sell these bait [packs][pouches] individually.

Optional Statements

Made in France